

trinityconsultants.com

May 23, 2019



Air Permits Initial Review Team (APIRT)
Texas Commission on Environmental Quality
12100 Park 35 Circle, MC 161
Building C, Third Floor, Room 300 W
Austin, TX 78753

RE: TCEQ Air Quality Standard Permit Renewal Application Standard Permit No. 91414 GAF Materials Corporation – Dallas, Dallas County, Texas Customer Reference Number (CN) 605251487 Regulated Entity Reference Number (RN) 100788959

Dear APIRT:

Building Materials Investment Corporation doing business as GAF Materials Corporation (GAF) owns and operates an asphalt roofing production facility located in Dallas, Texas (Dallas Plant). Operations at the Dallas Plant are authorized under New Source Review (NSR) Permit No. 7711A, Standard Permit No. 91414 and several Permits by Rule (PBRs). The Dallas Plant is a Title V facility operating under Site Operating Permit (SOP) No. 0-2771.

With this submittal, GAF is requesting to renew its existing Standard Permit No. 91414 (scheduled to expire on December 10, 2019). This streamline application to renew Standard Permit No. 91414 is submitted in accordance with Title 30 of the Texas Administrative Code (TAC) Chapter 116 and includes the attached TCEQ Form PI-1S, a copy of the Renewal Notice, and a copy of the current Standard Permit Registration (Permit No. 91414). The standard permit renewal fee has been submitted to the TCEQ Revenue Section electronically via the State of Texas Environmental Electronic Reporting System (STEERS).

If you have any questions regarding this submittal or require additional information about this permit renewal application, please feel free to contact me at (972) 661-8100 or via email at lkambham@trinityconsultants.com, or Mr. Kevin Bush, GAF, at (214) 637-8933.

Sincerely,

Trinity Consultants

Latha Kambham, Ph.D. Managing Consultant

Kilalpa Cathe

Attachments

cc: Ms. Elizabeth Smith, Air Section Manager, TCEQ Region 4

Mr. Brian Cunningham, Section Manager, City of Dallas Air Pollution Control Program

Mr. Kevin Bush, GAF

ATTACHMENT 1

TCEQ Form PI-1S

Texas Commission on Environmental Quality Form PI-1S Registrations for Air Standard Permit (Page 1)

I. Registrant Information			
A. Company or Other Legal Cus	stomer Name: Bu	ilding Materials Ir	vestment Corporation
B. Company Official Contact Inf	formation (Mr.	Mrs. Ms.	Other:)
Name: Wayne Scott			
Title: Plant Manager			
Mailing Address: 2600 Singleton I	Blvd		
City: Dallas	State: TX		ZIP Code: 75212
Phone: 214-637-8964		Fax: 214-637-5	202
E-mail Address: wayne.scott@ga	f.com	•	
All permit correspondence will be s	sent via e-mail.		
C. Technical Contact Informatio	n (Mr. Mrs	. Ms. Other:)
Name: Kevin Bush			
Title: Sr. Environmental Enginee	r		
Company Name: Building Materia	als Investment C	orporation	
Mailing Address: 2600 Singleton I	Blvd		
City: Dallas	State: TX		ZIP Code: 75212
Phone: 972-872-2325		Fax: 214-637-5 2	202
E-mail Address: kevin.bush@gaf.	.com		
II. Facility and Site Informat	ion		
A. Name and Type of Facility			
Facility Name: Dallas Plant			
Type of Facility: Asphalt Shingle Manufacturing	and Coating Mat	erials $oxed{oxed}$	Permanent Temporary
For portable units, please provide	the serial number	of the equipment t	peing authorized below.
Serial No:	9	Serial No:	

Texas Commission on Environmental Quality Form PI-1S Registrations for Air Standard Permit (Page 2)

II. Facility and Site Information	n (continued)			
B. Facility Location Information				
Street Address: 2600 Singleton Blv	⁄d			
If there is no street address, provide county, and ZIP code for the site (at				osest city or town,
City: Dallas	County: Dallas		ZIP Code: 7521 2	2
Latitude (nearest second): 32°46'40	,,	Longitude (neares	st second): 96°51	'48"
C. Core Data Form (required for	Standard Permit	s 6004, 6006, 6007,	6008, and 6013).	
Is the Core Data Form (TCEQ Form	10400) attached	<u></u> ያ?	☐ YES	S 🖂 NO
If "NO," provide customer reference	number (CN) an	d regulated entity nur	mber (RN) below.	
Customer Reference Number (CN):	CN605251487			
Regulated Entity Number (RN): RN1	00788959			
D. TCEQ Account Identification N	lumber (if known): DB-0378-S		
E. Type of Action:				
☐ Initial Application ☐ Change	e to Registration	☐ Renewal	⊠ Renewa	I Certification
For Change to Registration, Renewa	al, or Renewal C	ertification actions pro	ovide the followin	g:
Registration Number: 91414		Expiration Date: 12/1	10/2019	
F. Standard Permit Claimed: Pol	lution Control P	Project		
G. Previous Standard Exemption	or PBR Registra	tion Number		
Is this authorization for a change to standard exemption or PBR?	an existing facilit	y previously authorize	ed under a	☐ YES ⊠ NO
If "YES," enter previous standard ex effective date in the spaces provided		(s) and PBR registrat	ion number(s), ar	nd associated
Standard Exemption and PBR Regis	stration Number(s)	Effective Date	

Texas Commission on Environmental Quality Form PI-1S Registrations for Air Standard Permit (Page 3)

II. Facility and Site Information	n <i>(continued)</i>			
H. Other Facilities at this Site Auth	norized by Standa	ard Exemption, PBR, or Sta	ndard Pe	rmit
Are there any other facilities at this s Exemption, PBR, or Standard Permit		rized by an Air Standard		⊠ YES □ NO
If "YES," enter standard exemption number(s), and associated effective			Standard	Permit registration
Standard Exemption, PBR Registrati	on, and Standard	Permit Registration Numb	er(s)	Effective Date
PBR Registration No. 147140				01/05/2018
I. Other Air Preconstruction Perm	nits			
Are there any other air preconstruction	on permits at this	site?		⊠ YES □ NO
If "YES," enter permit number(s) in the	ne spaces provide	ed below.		
NSR Permit No. 7711A				
J. Affected Air Preconstruction Pe	ermits			
Does the standard permit directly affor	ect any permitted	facility?		☐ YES ⊠ NO
If "YES," enter permit number(s) in the	ne spaces provide	ed below.		
K. Concrete Batch Plant				
☐ Central Mix ☐ Ready Mix ☐	Specialty Mix	☐ Enhanced Controls for €	Concrete	Batch Plants
State Legislators				
State Senator:				
State Representative:				
2. County Judge				
Name:				
Mailing Address:				
City:	State:	ZIP Co	ode.	

Texas Commission on Environmental Quality Form PI-1S Registrations for Air Standard Permit (Page 4)

II. Facility and Site Informatio	on (continued)		
K. 3. Presiding Officer			
Is the facility located in a municipality	y or extraterritorial jurisdiction	n of a municipality? Y	ES NO
If "YES," list the name of the Presiding	ng Officer for the municipality	and/or extraterritorial ju	risdiction:
Presiding Officer Name:			
Title:			
Mailing Address:			
City:	State:	ZIP Code:	
L. Federal Operating Permit (FOR	P) Requirements	·	
Is this facility located at a site that is pursuant to 30 TAC Chapter 122?	required to obtain an FOP	☐ YES ☐ NO ☐ To B	e Determined
If the site currently has an existing F	OP, enter the permit number	: O-2771	
Check the requirements of 30 TAC (check all that apply).	Chapter 122 that will be trigge	ered if this standard perm	nit is approved
☐ Initial Application for an FOP	☐ Significant Revision for a	n SOP	vision for an SOP
Operational Flexibility/Off Permit	Notification for an SOP	☐ Revision f	for a GOP
☐ To be Determined		☐ None	
Identify the type(s) of FOP issued ar (check all that apply)	nd/or FOP application(s) subr	mitted/pending for the site	e.
⊠ SOP □ GOP	☐ GOP application/revisio	n (submitted or under AF	PD review)
☐ N/A ☐ SOP applicati	on/revision (submitted or und	ler APD review)	
III. Fee Information (see Section online)	on IX. for address to send fee	or go to www.tceq.texas	.gov/epay to pay
A. Fee Amount: \$900			
B. Payment Information			
Check/money order/transaction or vo	oucher number:		
Individual or company name on ched	ck:		
Was fee paid online?			⊠ YES □ NO

Texas Commission on Environmental Quality Form PI-1S Registrations for Air Standard Permit (Page 5)

IV. Public Notice (if applicable)				
A. Responsible Person (Mr.	Mrs. Ms. C	other:)		
Name:				
Title:				
Company:				
Mailing Address:				
City:	State:		ZIP Code:	
Phone:		Fax No.:		
E-mail Address:				
B. Technical Contact (Mr. Nr.	Mrs. 🗌 Ms. 🗌 Oth	er):		
Name:				
Title:				
Company:				
Mailing Address:				
City:	State:		ZIP Code:	
Phone No.:		Fax No.:		
E-mail Address:				
C. Bilingual Notice				
Is a bilingual program required by th	e Texas Education	Code in the School	ol District?	☐ YES ☐ NO
Are the children who attend either th your facility eligible to be enrolled in	_			☐ YES ☐ NO
If "YES," list which language(s) are r	equired by the bilir	ngual program?		

Texas Commission on Environmental Quality Form PI-1S Registrations for Air Standard Permit (Page 6)

IV.	Public Notice (if applicable) (continued)	
D.	Small Business Classification and Alternate Public Notice	
	s this company (including parent companies and subsidiary companies) have fewer 100 employees or less than \$6 million in annual gross receipts?	☐ YES ☐ NO
Is th Prog	e site a major source under 30 TAC Chapter 122, Federal Operating Permit ram?	☐ YES ☐ NO
Are to 50 tp	the site emissions of any individual regulated air contaminant equal to or greater than y?	☐ YES ☐ NO
Are to 75 tp	the site emissions of all regulated air contaminant combined equal to or greater than y?	☐ YES ☐ NO
E.	For Concrete Batch Plants	
1.	Public Works Project: Will the plant provide concrete to a public works project, and be located in or contiguous to the right of-way of the public works project? (If "YES," public notice is not required.)	☐ YES ☐ NO
2.	Application in Public Place	☐ YES ☐ NO
Nam	e of Public Place:	
Phys	ical Address:	
City:	County:	
٧.	Renewal Certification Option	
A.	Does the permitted facility emit an air contaminant on the Air Pollutant Watch List, and is the permitted facility located in an area on the watch list?	☐ YES ⊠ NO
B.	For facilities participating in the Houston/Galveston/Brazoria area (HGB) cap and trade program for highly reactive VOCs (HRVOCs), do the HRVOCs need to be speciated on the maximum allowable emission rates table (MAERT)?	☐ YES ⊠ NO
C.	Does the company and/or site have an unsatisfactory compliance history?	☐ YES ⊠ NO
D.	Are there any applications currently under review for this standard permit registration?	☐ YES ⊠ NO
E.	Are scheduled maintenance, startup, or shutdown emissions required to be included in the standard permit registration at this time?	☐ YES ⊠ NO

Texas Commission on Environmental Quality Form PI-1S Registrations for Air Standard Permit (Page 7)

٧.	Renewal Certification Option (continued)	
F.	Are any of the following actions being requested at the time of renewal:	☐ YES ⊠ NO
1.	Are there any facilities that have been permanently shutdown that are proposed to be removed from the standard permit registration?	YES ⊠ NO
2.	Do changes need to be made to the standard permit registration in order to remain in compliance?	☐ YES ⊠ NO
3.	Are sources or facilities that have always been present and represented, but never identified in the standard permit registration, proposed to be included with this renewal?	☐ YES ⊠ NO
4.	Are there any changes to the current emission rates table being proposed?	☐ YES ⊠ NO
cert	e: If answers to all of the questions in Section V. Renewal Certification Option are "NO ification option and skip to Section VII. of this form. If the answers to any of the question ewal Certification Option are "YES," the certification option cannot be used.	
	otice is applicable and comments are received in response to the public notice, the applify for the renewal certification option.	olication does not
NO the and	ce a check next to the appropriate box to indicate what you have included in you TE: Any technical or essential information needed to confirm that facilities are meeting standard permit must be provided. Not providing key information could result in an auto voiding of the project.	the requirements of omatic deficiency
A.	Standard Permit requirements (Checklists are optional; however, your review will go applicable checklists.)	faster if you provide
	you demonstrate that the general requirements in 30 TAC Sections 116.610 and .615 are met?	☐ YES ☐ NO
	you demonstrate that emission limitations in 30 TAC Sections 106.261 and 106.262 met?	☐ YES ☐ NO
Did met	you demonstrate that the individual requirements of the specific standard permit are?	☐ YES ☐ NO
B.	Confidential Information (All pages properly marked "CONFIDENTIAL")	☐ YES ☐ NO
C.	Process Flow Diagram	☐ YES ☐ NO
D.	Process Description	☐ YES ☐ NO
E.	Maximum Emissions Data and Calculations	☐ YES ☐ NO
F.	Plot Plan	☐ YES ☐ NO

Texas Commission on Environmental Quality Form PI-1S Registrations for Air Standard Permit (Page 8)

VI.	Technical Information Including State and Federal Regulatory Requirements	(continued)
NO the	ce a check next to the appropriate box to indicate what you have included in you TE: Any technical or essential information needed to confirm that facilities are meeting standard permit must be provided. Not providing key information could result in an auto voiding of the project.	the requirements of
G.	Projected Start Of Construction Date, Start Of Operation Date, and Length of Time at Site:	☐ YES ☐ NO
Proj	ected Start of Construction (provide date):	
Proj	ected Start of Operation (provide date):	
Leng	gth of Time at the Site:	
VII.	Delinquent Fees and Penalties	
the A	form will not be processed until all delinquent fees and/or penalties owed to the TCE Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Feocol. For more information regarding Delinquent Fees and Penalties, go to the TCEQ \v.tceq.texas.gov/agency/financial/fees/delin/index.html.	ee and Penalty
VIII.	Signature Requirements	
facts know Texa Act (gove signa deter signi	signature below confirms that I have knowledge of the facts included in this application are true and correct to the best of my knowledge and belief. I further state that to the wledge and belief, the project for which application is made will not in any way violate as Water Code (TWC), Chapter 7; the Texas Health and Safety Code, Chapter 382, the TCAA) the air quality rules of the Texas Commission on Environmental Quality; or any ernmental ordinance or resolution enacted pursuant to the TCAA. I further state that I usefure indicates that this application meets all applicable nonattainment, prevention of some rioration, or major source of hazardous air pollutant permitting requirements. The signative sawareness that intentionally or knowingly making or causing to be made false mate esentations in the application is a criminal offense subject to criminal penalties.	best of my any provision of the e Texas Clean Air / local Inderstand my ignificant ature further
Nam	e (printed): Wayne Scott	
Signa	ature (original signature required): \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	
Date	: 5/22/19	

Texas Commission on Environmental Quality Form PI-1S Registration for Air Standard Permit (Page 9)

IX. Copies of the Re	gistration	
Copies must be sent as li	sted below. Processing delays will occur if copies are not se	ent as noted.
Air Permits Initial Review Team (APIRT)	Regular, Certified, Priority Mail Mail Code 161, P.O. Box 13087, Austin, Texas 78711-3087 OR	Originals of Form PI-1S, Core Data Form, all attachments. Not required if using ePermits ¹ .
	Hand Delivery, Overnight Mail Mail Code 161, 12100 Park 35 Circle, Building C, Third Floor, Room 300 W, Austin, Texas 78753	
Revenue Section TCEQ	Regular, Certified, Priority Mail Mail Code 214, P.O. Box 13088, Austin, Texas 78711-3088 OR	Original Money Order or Check, Copy of Form PI-1S, Core Date Form. Not required if fee was paid using ePay ² .
	Hand Delivery, Overnight Mail Mail Code 214, 12100 Park 35 Circle, Building A, Third Floor, Austin, Texas 78753	
Appropriate TCEQ Regional Office	To find your regional office address go to www.tceq.texas.gov/assets/public/comm_exec/pubs/gi/gi- 002.pdf or call (512) 239-1250	Copy of Form PI-1S, Core Data Form, and all attachments. Not required if using ePermits ²
Appropriate Local Air Pollution Control Program(s)	To find your local air pollution control programs go to www.tceq.texas.gov/permitting/air/local_programs.html or call (512) 239-1250	Copy of Form PI-1S, Core Data Form, and all attachments

¹ ePermits located at <u>www3.tceq.texas.gov/steers/</u>

² ePay located at www.tceq.texas.gov/epay/
TCEQ-10370 (APDG 5235v29, Revised 01/19) PI-1S
This form is for use by facilities subject to air quality permit requirements and may be revised periodically.

ATTACHMENT 2

Copy of TCEQ Renewal Notice

Jon Niermann, *Chairman*Emily Lindley, *Commissioner*Toby Baker, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

November 15, 2018

MR BRUCE DAHLGREN
PLANT MANAGER
BUILDING MATERIALS INVESTMENT CORPORATION
2600 SINGLETON BLVD
DALLAS TX 75212-3738

Re: Standard Permit Registration Renewal Notification

Dear Mr. Dahlgren:

Section 382.055 of the Texas Clean Air Act, Texas Health and Safety Code, Chapter 382, and Title 30 Texas Administrative Code (30 TAC) § 116.604, requires the Texas Commission on Environmental Quality to notify the permit holder when it has been determined a registration is scheduled for renewal. Please apply for review of your registration renewal no later than June 13, 2019 using the application form available at the Web address below. Failure to submit your application prior to the expiration date will result in expiration of this registration.

Company Name - Building Materials Investment Corporation Customer Reference No. - CN605251487 Regulated Entity No. - RN100788959 Registration No. - 91414 Registration Expiration Date - December 10, 2019

If Standard Permit Registration Number 91414 is no longer needed (i.e.; permit consolidation, plant dismantled or shutdown, etc.) then complete a void request worksheet (Form No. 20569). The void request worksheet can be sent to the Air Permits Initial Review Team by email to apirt@tceq.texas.gov or fax at (512) 239-4500. Please furnish all information as indicated in the forms and instructions. You may download the void request worksheet and the required forms for the Standard Permit Registration renewal referenced below at:

www.tceq.texas.gov/search_forms.html.

Form PI-1S Registrations for Air Standard Permit (Form No. 10370) or Application and Certification Form for Municipal Solid Waste Landfills and Transfer Stations (Form No. 20296), if applicable TCEQ Core Data (Form No. 10400)

A fee based on the schedule indicated in 30 TAC § 116.614 must be submitted with this application. Upon receipt of your application, a determination will be made based on the number and type of emission points, emission rate and type of air contaminant, as to the need for you to furnish atmospheric dispersion modeling to determine the impact of emissions on the surrounding area.

Please disregard this notification letter if a renewal application has been submitted and is currently being processed.

Any application submitted by a person/entity who is delinquent on a fee and/or penalty will not be declared administratively complete until the fees/penalties are paid and/or current. Similarly, final action

Mr. Bruce Dahlgren Page 2 November 15, 2018

Re: Standard Permit Registration Renewal Notification

will be withheld by the agency on an application if it is discovered after the application is considered administratively complete that the owner/entity who submitted the application is delinquent on fees and/or penalties until such time as the fees/penalties are paid and/or current. You may visit the agency Web site for additional information at www.tceq.texas.gov/agency/delin/index.html.

If we may be of any assistance to you in this matter, you may contact the staff of the Air Permits Initial Review Team or you may contact me at (512) 239-1250.

Sincerely,

Johnny D. Bowers, Team Leader

Air Permits Initial Review Team

Air Permits Division

Texas Commission on Environmental Quality

cc: TCEQ Regional Air Quality Manager, Region 4

TCEQ Air Permits Initial Review Team (MC-161)

TCEQ File Room (MC-198)

ATTACHMENT 3

Copy of TCEQ Standard Permit Number 91414

Bryan W. Shaw, Ph.D., *Chairman*Buddy Garcia, *Commissioner*Carlos Rubinstein, *Commissioner*Mark R. Vickery, P.G., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 10, 2009

MR DAVID FUELLEMAN
PLANT MANAGER
BUILDING MATERIALS CORPORATION OF AMERICA
2600 SINGLETON BLVD
DALLAS TX 75212-3738

Standard Permit Registration Number:

91414 Renewal Date: December 10, 2019

Location:

2600 Singleton Blvd

City/County:

Dallas, Dallas County

Project Description/Unit:

GAF Materials

Regulated Entity Number:

RN100788959 CN602717464

Customer Reference Number:

Existing

New or Existing Site: Affected Permit (if applicable):

7711A

Standard Permit Type:

Pollution Control Project

Building Materials Corporation of America has registered the emissions associated with the installation of two baghouses at the GAF Materials facility under the standard permit listed above as authorized by the Commissioners pursuant to Title 30 Texas Administrative Code § 116.602 (30 TAC § 116.602). Emissions are listed on the attached table. This Standard Permit should be incorporated into NSR Permit No. 7711A at next amendment or renewal. For rule information see:

http://www.tceq.state.tx.us/permitting/air/nav/standard.html.

You are reminded that 30 TAC § 116.615 requires that any construction or change authorized by this standard permit should be consolidated into the affected facilities' permit(s) at the next amendment or renewal.

Planned MSS emissions for startup and shutdown have been reviewed. These authorized MSS emissions are included on the emissions table. No other planned MSS emissions will be authorized under this registration.

As of July 1, 2008, all analytical data generated by a mobile or stationary laboratory in support of compliance with air permits must be obtained from a NELAC (National Environmental Laboratory Accreditation Conference) accredited laboratory under the Texas Laboratory Accreditation Program or meet one of several exemptions. Specific information concerning which laboratories must be accredited and which are exempt may be found in 30 TAC § 25.4 and § 25.6.

For additional information regarding the laboratory accreditation program and a list of accredited laboratories and their fields of accreditation, please see the following Web site:

http://www.tceq.state.tx.us/compliance/compliance support/qa/env lab accreditation.html

For questions regarding the accreditation program, you may contact the Texas Laboratory Accreditation Program at (512) 239-3754 or by email at labprgms@tceq.state.tx.us.

Mr. David Fuelleman Page 2 December 10, 2009

Re: Standard Permit Registration Number 91414

The company is also reminded that these facilities may be subject to and must comply with other state and federal air quality requirements. If you have questions, please contact Mr. Emmanuel Ukandu, P.E., at (713) 767-3699. This action is taken under authority delegated by the Executive Director of the TCEQ.

Sincerely,

Anne M. Inman, P.E., Manager

Rule Registrations Section

Air Permits Division

Texas Commission on Environmental Quality

cc: Section Manager, Air Pollution Control Program, City of Dallas Environmental and Health Services, Dallas

Air Section Manager, Region 4 - Fort Worth

Project Number: 152625

Standard Permit Maximum Emission Rates Table Permit Number 91414

The facilities and emissions included in this table have been represented and reviewed as the maximum emissions authorized by this standard permit registration.

EPN / Emission Source Specific VOC or Other Pollutants	Specific VOC or			NOx		CO		PM ₁₀		PM _{2.5}		SO ₂		Other	
	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	
NST1								0.07	0.31	0.07	0.31				
NST2								0.07	0.31	0.07	0.31				
MSS								0.14	0.62	0.14	0.62				
TOTAL I	EMISSIONS (TPY):	×						0.28	1.24	0.28	1.24				
MAXIMUM OPERATING SCHEDULE:		Hours/Day		Days/Week		Weeks/Year		Hours/Ye		s/Year	876				

VOC - volatile organic compounds

NO_x - total oxides of nitrogen

CO - carbon monoxide

 PM_{10} - particulate matter equal to or less than 10 microns in size $PM_{2.5}$ particulate matter equal to or less than 2.5 microns in size

SO₂ - sulfur dioxide

^{**}Fugitive emissions are an estimate only and should not be considered as a maximum allowable